



Miedel & Mysliwiec LLP

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW
YORK
BROOKLYN OFFICE

October 15, 2021

VIA ECF

Hon. Carol Bagley Amon
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

*Application
granted
S. Obede*

s/Carol Bagley Amon

Re: United States v. Shaquan Coloma, 21-CR-257 (CBA,

Dear Judge Amon,

10/21/21

I was appointed to represent Shaquan Coloma on April 15, 2021. I write respectfully to request authority to obtain services in an amount in excess of the maximum allowed under the provisions of subsection (e)(3) of the Criminal Justice Act (18 U.S.C. § 3006A), as follows:

Name of Expert:	Austin Dean (Miedel & Mysliwiec LLP)
Address:	80 Broad Street, Suite 1900, New York, NY 10004
Type of Expert:	Paralegal
Estimated Compensation:	\$2,250
Requested Hourly Fee:	\$75
Multi-Defendant Case:	No

Justification:

On September 13, 2021, Mr. Coloma pleaded guilty to three counts of the indictment in this matter.

I am a partner in a two-partner law firm. My firm employs one full-time paralegal, Austin Dean. Mr. Dean, whose CV is attached for the Court's review, is regularly appointed to assist my representation of clients in this District and the Southern District of New York. Among other tasks, Mr. Dean conferences and corresponds with clients and their family members and gathers mitigation materials and records relevant to sentencing.

Earlier today, the Probation Office conducted Mr. Coloma's presentence investigation interview. The interview raised several issues relevant to mitigation that warrant further exploration. In order to present a more thorough and effective sentencing submission to the Court, I anticipate conferencing several times with my client and his family members and preparing multiple records requests. Appointing a paralegal to assist me with these tasks, which will include analyzing and summarizing mental health and school records, will

ultimately save the Court money, as Mr. Dean will bill at a lower rate to perform services that I would otherwise complete myself.

Accordingly, I respectfully request that the Court appoint Mr. Dean to work on this case for 30 hours at the rate of \$75/hour, *nunc pro tunc* to October 15, 2021, with leave to apply for more time, should it become necessary.

I thank the Court for its consideration.

Respectfully submitted,

/s/

Florian Miedel
Attorney for Shaquan Coloma